

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

*Southern District of New York*  
Jennifer L. Brown  
Attorney-in-Charge

August 7, 2023

**BY ECF AND EMAIL**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Valerie Kelley  
23 Mag. 5827 (UA)**

Dear Judge Gorenstein:

I write, with the consent of the government, to respectfully request a modification of Valerie Kelley's bail conditions to omit the requirement of two cosigners on the bond in the Southern District of New York.

On August 1, 2023, Ms. Kelley was presented in Magistrate Court before Judge James L. Cott pursuant to Rule 5(c)(3) for an indictment in the Eastern District of Missouri. The parties agreed to the following bail conditions:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pretrial services supervision as directed; travel restricted to the Southern District of New York, the Eastern District of New York, the Eastern District of Missouri (for court cases only) and the Eastern District of Pennsylvania (for court cases only); surrender all travel documents with no new applications; standalone GPS location monitoring; drug testing and treatment as directed; mental health testing and treatment as directed; no possession of any personal identifying information; clear outstanding bench warrants; appear in court and at pretrial services in St. Louis, Missouri on August 10, 2023; and not commit any new crimes.

Ms. Kelley was released on her own signature and given until August 10, 2023 to meet the conditions of the bond. The day of her release, August 1, Ms. Kelley was outfitted with a GPS location monitor before returning home.

The following day, Judge Cott signed a Travel Order directing the U.S. Marshals to arrange travel for Ms. Kelley from New York to the Eastern District of Missouri for her August 10 court appearance. Today, the Marshals confirmed Ms. Kelley's flight to St. Louis on August 9, 2023.

Hon. Gabriel W. Gorenstein

In the days since Ms. Kelley's presentment, despite ongoing conversations with Ms. Kelley's close family members, we have been unable to secure co-signers to her bond. Accordingly, and because Ms. Kelley will very soon receive new conditions of release from the Eastern District of Missouri that will supersede the SDNY conditions, Ms. Kelley respectfully requests that the Court omit the condition requiring co-signers to the bond. The government consents to this request.<sup>1</sup>

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

*Counsel for Valerie Kelley*

cc: Counsel of record

**SO ORDERED:**



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**THE HONORABLE GABRIEL W. GORENSTEIN**  
United States Magistrate Judge

August 8, 2023

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<sup>1</sup> In the alternative, Ms. Kelley requests a two-week extension to secure cosigners to the bond. The government also consents to this request.